

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

WILDBIRD LLC,

Plaintiff,

v.

WILDRIDE B.V., and WILDRIDE USA CORP.,

Defendants.

Civil Action No: 1:25-cv-05993

**[PROPOSED] ORDER TO SHOW CAUSE ON
PLAINTIFF WILDBIRD LLC’S PRELIMINARY-INJUNCTION MOTION**

WHEREAS, on July 22, 2025, Plaintiff Wildbird LLC (“Wildbird”) commenced the above-captioned civil action (the “Action”) by filing a Complaint, Request for the Issuance of Summons; Civil Cover Sheet; Form AO-120; and FED. R. CIV. P. 7.1 Disclosure Statement;

WHEREAS, on July 22, 2025, Wildbird also filed a motion for a preliminary injunction (the “Motion”) against Defendants, Wildride B.V., and Wildride USA Corp. (together, “Defendants”); and

WHEREAS, in support of the Motion, Wildbird filed a Memorandum of Law; the Declaration of Nate Gunn (and Exhibits 1-10 thereto); and the Declaration of Jonathan W. Thomas, Esq. (and Exhibits 1-7 thereto) (collectively, “Wildbird’s Motion Papers”).

NOW, THEREFORE, the Court, having reviewed and considered Wildbird’s Motion Papers, as well as the record in this action to date, hereby **ORDERS** the Defendants to show cause on _____, 2025, at ____ am/pm Eastern Time in Courtroom ____ of the United States Courthouse for the United States District Court, Southern District of New York, 500 Pearl

Street/40 Foley Square, New York, New York 10007, as to why this Court should not enter an Order, pursuant to FED. R. CIV. P. 65(a) and LOCAL CIVIL RULE 7.1(a)(1), which:

1. Preliminarily enjoins Defendants, their agents, servants, employees, officers, and all persons and entities in active concert and participation with them, from using the trademark “WILDRIDE” (or any other mark(s) confusingly similar to Plaintiff’s “WILDBIRD” trademark) in United States commerce for, on, and/or in connection with the manufacture, distribution, advertising, promoting, offering for sale, and/or sale of any goods or services, including, without limitation, children’s accessories and clothing;

2. Orders Defendants to file with the Court and serve upon Plaintiff’s counsel, within 30 days after service of the order of an injunction, a report in writing and under oath setting forth in detail the manner and form in which Defendants have complied with the injunction; and

3. Awards to Plaintiff any further relief that this Court deems just and equitable.

IT IS SO ORDERED this ____ day of _____, 2025.

United States District Judge
Southern District of New York